

July 20, 2012

## **VIA ECF**

Honorable Lois H. Goodman, U.S.M.J. U.S. District Court for the District of New Jersey Clarkson S. Fisher Federal Building & U.S. Courthouse 402 East State Street Trenton, New Jersey 08608

John E. Flaherty
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Re: Orexo AB v. Mylan Pharmaceuticals Inc., et al. Civil Action No. 11-3788 (FLW) (LHG)

Dear Judge Goodman:

Our firm, along with our co-counsel Milbank, Tweed, Hadley & McCloy, represents Plaintiff Orexo AB in the above-referenced matter. We write on behalf of all parties to request a further extension of two weeks for all discovery deadlines, which has been agreed to by the Parties. The requested extension includes today's deadline to complete discovery relating to claim construction, up to but not including the January 18, 2013 advice of counsel deadline. The January 18, 2013 date and all dates thereafter will remain as scheduled in this Court's February 7, 2012 Pretrial Scheduling Order.

The Parties enclose a proposed revised schedule as Exhibit A setting forth all affected dates for the Court's consideration. If the Court finds this revised schedule acceptable, we ask that the Court "So Order" the revised dates as set forth in the attached schedule.

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McCarter & English, LLP

BOSTON Respectfully,

HARTFORD S/John E. Flaherty

John E. Flaherty

NEW YORK

**NEWARK** 

cc: All Counsel (via email)

(1.5. )

So ordered on this \_\_\_ day of July, 2012:

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Hon. Lois H. Goodman, U.S.M.J.

WILMINGTON

**PHILADELPHIA** 

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## Exhibit A

	March 28, 2012 Order (Amending Feb. 7, 2012 Pretrial Scheduling Order (D.I. 49))	Proposed Further Extensions to Pretrial Scheduling Order
Plaintiff's and Defendants' completion of discovery relating to claim construction	July 20, 2012	August 3, 2012
Plaintiff's and Defendants' filing and service of Markman briefs	August 6, 2012	August 20, 2012
Plaintiff's and Defendants' meet and confer to propose schedule for Claim Construction Hearing	August 17, 2012	August 31, 2012
Conclusion of any discovery from an expert witness who submitted a certification or declaration under L. Pat. R. 4.5(a)	September 5, 2012	September 19, 2012
Plaintiff's and Defendants' filing and service of responding <i>Markman</i> briefs	October 5, 2012	October 19, 2012
Plaintiff's and Defendants' deadline for producing and providing material related to party's reliance on advice of counsel as part of patent-related claim or defense	January 18, 2013	January 18, 2013